

# Fact Sheet



## For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-03300001-2012**  
Application Received: **September 10, 2010**  
Plant Identification Number: **033-00001**  
Permittee: **GrafTech International Holdings, Inc.**  
Facility Name: **Anmoore Facility/ Harrison County**  
Mailing Address: **101 North Philippi Pike**  
**P.O. Box 120**  
**Anmoore, WV 26323**

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Physical Location: Anmoore, Harrison County, West Virginia  
UTM Coordinates: 561km Easting • 4,345km Northing • Zone 17  
Directions: Rt 58, Phillippi Pike at Anmoore, WV

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### Facility Description

GrafTech's Anmoore facility falls under the SIC code of 3624 for carbon and graphite products. This facility produces specialty carbon and graphite products by forming "green" carbonaceous shapes from raw materials consisting of petroleum coke and coal tar pitch. The "green" products are baked in natural gas fired, high temperature ovens and are then treated with liquid petroleum pitch and baked again prior to being processed into graphite using electrically heated furnaces. The graphite shapes are then purified, machined and processed into varying products which are further processed to enhance their properties prior to shipment.

SIC Codes: 3624 - Electronic and Other Electrical Equipment & Components – Carbon and Graphite Products.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2009 Actual Emissions</b>
Carbon Monoxide (CO)	2905.667	697.3
Nitrogen Oxides (NO <sub>x</sub> )	33.106	23.9
Particulate Matter (PM <sub>2.5</sub> )	17.235	
Particulate Matter (PM <sub>10</sub> )	196.095	
Total Particulate Matter (TSP)	344.709	31.4
Sulfur Dioxide (SO <sub>2</sub> )	134.263	38.6
Volatile Organic Compounds (VOC)	44.218	17.6

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2009 Actual Emissions</b>
POM	6.3	3.1
Phenol	1.44	0.38
Chlorine	0.026	0.013
Formaldehyde	0.033	0.025
HAP VOCs	3.14	0.025

*Some of the above HAPs may be counted as PM or VOCs.*

### Title V Program Applicability Basis

Upon renewal of the Title V Operating Permit this facility maintains the potential to emit 2,906 TPY of carbon monoxide (CO), 196 TPY of particulate matter (PM<sub>10</sub>), 134 TPY of sulfur dioxide (SO<sub>2</sub>). Due to the facility's potential to emit over 100 tons per year of criteria pollutant, GrafTech is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2 45CSR6 45CSR7  45CSR10 45CSR11 45CSR13 WV Code § 22-5-4 (a) (14)  45CSR30 40 C.F.R. Part 61 40 C.F.R. Part 64 40 C.F.R. 68 40 C.F.R. Part 82, Subpart F	Opacity and PM limits for boilers Open burning prohibited. PM and Opacity limits for manufacturing sources Sulfur dioxide limits Standby plans for emergency episodes. Minor Source NSR Permitting Requirements The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Asbestos inspection and removal Compliance Assurance Monitoring Risk Management Plan Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Description, Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-0874	09/16/86	90/50 mixing system, emission point 019 PM limit of 1.06 lb/hr PM
R13-0893	11/20/86	Shredding carbonized material 2000 hr/yr. Control device was moved to rail car unloading so rest of the permitted activities have been deemed inactive.
R13-1151	10/26/89	Graphite Antioxidant treating process - 833 lb/hr drying oven Em. Pt. ID 307.
R13-1540B	07/11/05	Update to GRI process in order to accurately reflect the use of a non-VOC binder solution as well as incorporating "ready to use" fibers rather than producing onsite. Permit covers pit baking of rigid graphite insulation
R13-1569A	07/20/99	Mod. to the processing of porous carbon, in which the pit baking furnaces will no longer be utilized and are to be replaced by the car bottom furnaces which are permitted under R13-2058A.

<b>Permit or Consent Order Number</b>	<b>Date of Issuance</b>	<b>Permit Description, Determinations or Amendments That Affect the Permit (if any)</b>
R13-1934B	01/10/06	Purification appl. to bring equip. IDS in line with those shown in T-5 application, 1540A, and 1569A. This permit covers the graphite purification furnaces Em. Pt. IDS (055, 079).
R13-2047	06/04/97	Vacuum pack transfer Loading of portable metal pack containers at bld 65, unloading at bld 54
R13-2058C	06/06/06	Modification to R13-2058B which includes the addition of a second walk in, natural gas fired heat treating oven (095) and several fabrication stations with attendants for new IHM product. The materials will be fabricated inside the building and heat treated in the new heat treat oven, as well as the existing (094) oven and the existing carbottom furnaces (080-L, 080-M, 080-N), which will be serviced by an existing incinerator (EP#080).
PD99-262	12/07/99	Determination for the installation of an electrically heated Kiln in the bake department No permit required.
PD96-063	4/24/96	No permit required, Changes to the Graphite Machining facility, which included the relocation of one saw and the installation of a baghouse type dust collection system. Em.Pt. 083 fugitive #233
PD95-009	04/09/95	No Permit Required
PD95-091	12/27/95	No Permit Required
PD98-033	3/19/98	Permit Required, Determination for the addition of four pieces of machining equipment for the surface preparation of carbonaceous shapes. This was later incorporated in R13-2058A
PD98-014	2/26/98	No Permit Required, installation of 2 NG nitrogen heaters to be used in conjunction with the car bottom furnaces permitted under R13-2058

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

## Changes incorporated in renewal permit

### Section 1.0

Within the Equipment Table, emission point 030 was changed to 031 to match the designation of the affected equipment within the 40" press system. Additionally, emission point 031 was changed to 032 to match the 032 PGW equipment designations. These changes were also reflected within the emission limit table of 12.1.5.

Additionally, within the equipment table, under emission point 014, baghouse #1 was updated to reflect a 2010 replacement date and new capacity. The same was also updated for baghouse #3 on emission point 022. Likewise, the baghouse on emission point 026 was updated to reflect a 2001 installation date in place of the original 1940 date. Emission unit ID 055I was removed from emission point 055 due to the cabinet no longer being used.

A new table and section was added as 1.2 of the permit just below the equipment table to accommodate a citing of all active construction and modification permits and the date of their last modification. This also caused the equipment table to be re-designated as section 1.1. of the permit.

### Section 3.0

The facility wide opacity demonstration language of 3.3.2 was modified to also include opacity testing for 45CSR6 in addition to the existing 45CSR7 language. This was found to be necessary for incinerators covered by 45CSR6 which serve as a control device for the manufacturing process source operation covered by 45CSR7. Additionally, a clarifying applicability note was added in accordance with a determination made by DAQ Compliance and Enforcement. The note states the following: Incinerators used to control PM from 45CSR7 sources are subject only to the incinerator opacity requirements of 45CSR6 since the incinerator is the last unit operation prior to the emission release.

### Section 5.0

Permit condition 5.1.1 was revised slightly with respect to the streamlining language and citation. The clarification was related to the fact that the actual PM limits appeared in R13-2058 permit condition 4.1.11 rather than the original citation of 4.1.6 which encompassed the underlying PM requirement from 45CSR7, which was streamlined.

Under permit condition 5.1.4 an additional permit condition link was added to the citation to also incorporate R13-2058 condition 4.2.3.

Permit condition 5.1.30 was revised to eliminate emission source 078 from the streamlining language since the Attachment it referenced did not have any PM requirements for this source. Therefore, a PM limit of 0.14 lb/hr was added to this condition for the 078 incinerator.

Permit condition 5.1.32 was renumbered as 5.1.33 due to the inclusion of a new opacity requirement which further clarified the 45CSR6 opacity limit within 5.1.31. Additionally, condition 5.1.33 was bumped to 5.1.34

Under the new permit condition 5.1.34, which was previously 5.1.33, equipment ID(s) 094 and 095 were removed from the citation since these source were related to heat treat ovens and not their control device stack, which was already included as 080.

Original permit condition 5.1.34 and 5.1.36 were removed since they related to fugitive emission requirements of 45CSR7-5.1 and 5.2, which were already included within the facility wide requirements of 3.1.9 and 3.1.10. However, the R13-2058 citations of 4.1.8 and 4.1.9 were added to these facility wide requirements. As a result of these changes the numbering of 5.1.37 was changed to 5.1.35. Likewise, 5.1.38 was changed to 5.1.36 and 5.1.39 was changed to 5.1.37

### Section 6.0

Under the citations within conditions 6.1.1 and 6.1.3 pertaining to the 45CSR7 opacity requirements, emission point IDs were added for the 040 baghouse and the 212 pitch impregnation building roof monitor.

The citation of 6.2.3 was revised by removing equipment ID 41C, 41D, and 41E since the requirement was specific only to the electrostatic precipitator and not the other pitch impregnation equipment.

### **Section 7.0**

Condition 7.1.2, which pertains to an HCL emission limit for emission point ID 307, was modified to also recognize the 210 mg/m<sup>3</sup> HCL concentration limit of 45CSR§7-4.2.

On the last row of the table within condition 7.1.4 a number 2 superscript was added just after the 079 equipment designation in order to correspond with the #2 footnote below the table. The streamlining language was also revised to cite the underlining regulatory requirement rather than the permit condition number containing this requirement.

A similar revision was also implemented within the streamlining language of 7.1.5.

Under the citations within conditions 7.1.7 and 7.1.8 pertaining to the 45CSR7 opacity requirements, emission point IDs were added for 222, 224, 225, 223, 307, 306, 320, 055 and 079.

The citation to permit condition 7.1.9 was updated to reflect the two minor source NSR references which were also relevant to the requirement.

In accordance with 45CSR13 permit number R13-1540, conditions 4.4.2 and 4.4.3, Title V permit conditions 7.4.4 and 7.4.5 were added to the renewal permit in include “Record of Maintenance of Air Pollution Control Equipment” and “Record of Malfunctions of Air Pollution Control Equipment”.

### **Section 8.0**

The streamlining language of 8.1.2 was revised slightly by removing the reference to 8.1.3. Additionally, 8.1.3 and 8.1.4 added a citation reference to 45CSR13 permit number R13-2047 condition B.2.c and B.2.a respectively.

### **Section 9.0**

The citations of conditions 9.1.7 and 9.1.8 were revised to include all applicable emission point IDs as well as the underling regulation citations of 45CSR§7-3.1 and §7-3.2. Likewise a regulation citation was added to 9.1.9. Also within condition 9.1.8 the referenced permit condition was changed from 9.1.8 to 9.1.7 in order to correspond with the preceding condition.

In 9.2.1 a reference to permit condition 9.1.4 was added to this monitoring requirement to recognize applicability to pertaining to the 079 scrubber as well.

The language within the stack testing provisions of 9.3.2 was revised to recognize the initial testing of 055 and the resulting new conditions that would result in the need for subsequent testing of 055 and the initial testing of 079.

Section 9.6 of the permit was updated to require the source to update their minor NSR permit R13-1934B to reflect the initial compliance testing conducted August 2006, on the (055) scrubber. However, a second test was conducted on July 19, 2007 after the first one failed to demonstrate compliance. Prior to the second testing event, which eventually demonstrated compliance, the permittee made changes to the scrubber to increase the efficiency of the unit. As a result, additional packing was added and the rate of caustic sent to the scrubber was increased. The test results defined a flow rate of 150 gpm of caustic, having a minimum pH of 12 and a caustic delivery pressure to the spray nozzles of 39 psig. Because of these significant operating parameter changes, the source proposed to update their minor NSR permit R13-1934B to incorporate the changes and findings from the test. This logic was relayed to DAQ in an August 27, 2007 letter from Bill Smith who was representing the company as a consultant at the time. However, no permit modification has been received by the DAQ. Therefore, it is in the writer’s opinion that the minor source NSR permit needs to be updated under a compliance plan instigated by a the new condition, 9.6.1, of the proposed renewal permit. The permit application shall address new more descriptive emission limits, which include HCL instead of total chlorides to correlate with EPA’s part 60 Method 26A. Additionally, the operating limits proven during the compliance test shall replace the old operating limits incorporated within permit condition 9.1.3.

### **Section 10.0**

The citations to permit conditions 10.1.1 and 10.1.2 were revised to include the applicable emission point IDs.

### **Section 11.0**

Within the heading of this section two emission points 209 and 210 corresponding to bench scale quality control testing lab hoods were removed since they were listed as having insignificant VOC emissions as their only potential emissions at 0.01 lb/hr. Therefore, these lab hoods are determined insignificant sources at this time.

Under conditions 11.1.1 and 11.1.2 applicable emission point IDs were added to the citations. Under permit condition 11.1.3 specific PM emission limits were incorporated for emission points 053 and 402 based on their process weight rate in accordance with 45CSR§7-4.1.

### **Section 12.0**

Within the heading of this section all applicable emission point IDs were added. These emission point IDs were also added to 12.1.3 and 12.1.4.

Permit Condition 12.2.2 was modified for dust injection baghouses (031 and 032) to incorporate the results of a successful stack testing event required by the initial Title V. The testing was conducted on June 17 and 18 of 2008. Some slight language changes were incorporated to recognize that testing has been completed and the more specific differential pressure limits were added. Additionally, the initial compliance testing provision of 12.3.2 was removed since it has been completed and no additional testing was deemed necessary at this time. Also work practice conditions 12.2.2.c and 12.2.2.d were removed as they pertained to the amount of dust injected into the lines of the collection system and the outside air draft damper. Since both of these operating parameters are set and adjusted only as needed to maintain adequate pressure drop across the baghouse, they were determined to be unnecessary since compliance is based on the primary pressure differential indicator.

Permit Condition 12.2.3 was modified to adjust the delta P operating limit for the (019) baghouse from “ $6 < (\text{delta } P) < 11$  inches (W.C.)” to “ $3 < (\text{delta } P) < 9$  inches (W.C.)”. This change was a result of replacing the bags within this control device, which lowered the overall pressure. The unit has successfully documented compliance with the opacity limitations using the new bags and in general is expected to operate more efficiently. The new operating limit was derived from historic operating data tabulated after the changes to the baghouse were completed.

### **New 40CFR64 Requirements**

The new CAM requirements were added as permit conditions 5.1.36, 5.2.5, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.11, 5.4.7, and 5.5.2 for the (080) incinerator. Also within section 5.0, CAM requirements were incorporated within 5.1.37, 5.2.6, 5.2.8, 5.2.9, 5.2.10, 5.3.3, 5.4.7, and 5.5.2 for baghouses (082) and (039). New CAM requirements were incorporated for baghouse (040) with 6.1.6, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.3.2, 6.4.4, and 6.5.2. Likewise baghouses (070) and (074) received new CAM requirements added to the permit as conditions 8.1.6, 8.2.4, 8.2.5, 8.2.6, 8.2.7, 8.3.3, 8.4.2, and 8.5.2. The CAM requirements for baghouse (056) were added as permit conditions 10.1.4, 10.2.2, 10.2.3, 10.2.4, 10.2.5, 10.3.2, 10.4.2, and 10.5.2. For baghouses (012, 013, 014, 015, 016, 017, 018, 020, 023, 024, and 025) new CAM requirements were added as permit conditions 12.1.6, 12.2.4, 12.2.5, 12.2.6, 12.2.7, 12.3.2, 12.4.6, and 12.5.2.

### **Determinations and Justifications**

#### **40 C.F.R. Part 64 – Compliance Assurance Monitoring**

The permittee submitted a CAM plan in the renewal application for 19 different control devices. In order to facilitate discussion, the proposed CAM monitoring for these sources has been broken up into two separate categories based on their method of control. The first grouping includes all sources which control PM by incorporation of a baghouse. These sources, (ID#s 012, 013, 014, 015, 016, 017, 018, 019, 020, 023, 024, 025, 039, 040, 056, 070, 074, and 082) have proposed to comply with CAM by using a daily visible emission (VE) reading

conducted in accordance with Method 22 as their indicator of control equipment performance. An excursion would be triggered by the observation of any visible emissions and corrective actions would be initiated. If the number of excursions exceeds 5% of the monitoring results within one calendar quarter then the permittee shall be required to notify the agency and address the need for a quality improvement plan (QIP). It should be noted that typical control device parameters would normally be required for CAM as opposed to an opacity limitation for verifying compliance due to the challenges of correlating a specific opacity reading to a weight rate of pounds per hour. However, a great deal of consideration went into approving this CAM plan in which the following points were taken into account:

- The use of a differential pressure gauge is prone to clogging due to the dirty side of the baghouse being tapped.
- The PM emission limits were derived from 45CSR7 and based on process weight rates, which results in a substantial compliance margin when using baghouse control because Rule 7 allowables are much higher than potentials after controls.
- Since a baghouse has a very high operating efficiency for removing PM (99+%) we would not expect to see any emissions from the baghouses if they are operating properly.
- The excursion threshold was established as any visible emissions, which removes the complications of correlating opacity to (lb/hr) weight rates.

However, as a result of this review, the writer has determined that the 019 baghouse, will be exempt from CAM due to the thorough monitoring and testing requirements incorporated within the facility's existing Title V permit. The control device is currently required to monitor pressure drop across the baghouse in accordance with permit condition 12.2.3 and is required to operate between  $3 < (\Delta P) < 9$  inches (W.C.). This exemption is cited under 40CFR64.2(b)(1)(vi) due to the source already having a continuous compliance determination method in place within their Title V permit that satisfies the Part 64 definition of this term.

The second category of CAM monitoring is related to the control of POM originating from the curing operations from three car bottom furnaces and two walk in heat treat ovens which cure various carbon products. These curing furnaces (totaling 8.3 MM Btu/hr) are controlled by a common natural gas fired incinerator rated at 3.5 MM Btu/hr (ID# 080). This incinerator is equipped with a temperature monitoring device within its combustion chamber. The temperature shall be recorded once per operating shift and a deviation shall be defined as any temperature below 750 degrees C. Two deviations in a day constitute an excursion. If the number of excursions exceeds 5% of the monitoring results within one calendar quarter then the permittee shall be required to notify the agency and address the need for a quality improvement plan (QIP).

A number of other control devices were also evaluated for CAM applicability. The other sources evaluated and found to have potentials below major source thresholds have the following equipment IDs: 001, 002, 003, 004, 005, 006, 007, 008, 009, 010, 011, 021, 022, 026, 031, 032, 036, 037, 038, 042, 043, 046, 047, 048, 049, 055, 079, 057, 058, 059, 060, 061, 062, 063, 065, 066, 067, 076, 077, 78, 081, 087, 402, 053, 041A and 041B. Some of the control devices were permitted to discharge within building enclosures and therefore did not vent directly to the atmosphere. These source IDs are listed as 401 and 091. Bin vent control device, 092, was also evaluated for CAM and found to be listed in the application as an integral control device which is used to collect a product stream.

**Greenhouse Gas Permitting** - This is a renewal Title V permit and there have been no modifications that would have triggered a PSD permit. Therefore, there are no applicable GHG requirements.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. 40CFR60 Subparts K, Ka, Kb —Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978; prior to July 23, 1984; or after July 23, 1984 respectively.

Regardless of the construction date these NSPS standards have an applicability threshold of either 40,000 or 20,000 gallons in which GrafTech does not satisfy. The Company's largest volatile organic liquid tank is less than 10,000 gallons. Therefore, the above referenced NSPS are not applicable to the following tanks permitted herein:

- 10,000 gallon, Tectyl 779 Bulk Process Oil Tank, constructed in 1988, Emission Point ID (241)  
6,000 gallon, Diesel Fuel Storage Tank, constructed in 1985, Emission Point ID (215)  
1,000 gallon, Unleaded Gasoline Fuel Storage Tank, constructed 1985, Emission Point ID (216)  
500 gallon, Kerosene Fuel Storage Tank, constructed 1985, Emission Point ID (217)
- b. 40CFR60 Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.  
GrafTech operates four boilers having the following characteristics:  
Natural Gas Fired Boiler, Constructed in 1981, Rated capacity of 11.0 MMBtu/hr, ID (300)  
Natural Gas Fired Boiler, Constructed in 1960, Rated capacity of 8.6 MMBtu/hr, ID (301)  
Natural Gas Fired Boiler, Constructed in 1960, Rated capacity of 15.5 MMBtu/hr, ID (308)  
Natural Gas Fired Boiler, Constructed in 1960, Rated capacity of 13.0 MMBtu/hr, ID (309)  
As a result of these boilers being constructed before the corresponding applicability data of, June 9, 1989 the boilers listed above were found not subject to the said NSPS.
- c. 40CFR63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial Commercial and Institutional Boilers and Process Heaters.  
Even though this regulation has been stayed by the courts, any final regulation promulgated by EPA is not expected to affect GrafTech because the facility is not a major source of Hazardous Air Pollutants at this time.
- d. 40CFR63, Subpart JJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial Commercial and Institutional Boilers Area Sources  
Gas boilers are listed as being specifically exempt from these area source requirements under §63.11195(e)
- e. Title V application states the facility's major sources predate WV PSD program under 45CSR14.
- f. 40CFR63, Subpart SSSSS – Refractory Ceramic MACT – GrafTech maintains the exemption criteria based on carbon and chromium content within their products. However, this source also only affects major HAP sources, which GrafTech is not.

### **Request for Variances or Alternatives**

None

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: March 16, 2012  
Ending Date: April 16, 2012

All written comments should be addressed to the following individual and office:

Jesse Hanshaw, P.E.  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Point of Contact**

Jesse Hanshaw, P.E.  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
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### **Response to Comments (Statement of Basis)**

Pending